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VIA ECF

The Honorable Jennifer L. Rochon
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Cengage Learning, Inc. et al. v. Google LLC*, No. 24:cv-04274-JLR-BCM
Letter Request to File Redacted Documents

Dear Judge Rochon:

Pursuant to Rule 4(B)(iii)(c) of Your Honor's Individual Rules of Practice in Civil Cases, Plaintiffs respectfully seek the Court's approval to redact 1) portions of an email from Google's counsel dated June 9, 2025; 2) portions of the Declaration of Attorney Jeff Kane filed in support of Plaintiffs' Sur-Reply in Opposition to Google's request to stay discovery. Plaintiffs are requesting redactions solely based on Google's position that the information contained in the redacted portions is confidential.

The June 9 form Google's counsel is marked "Confidential Settlement Communication Subject to Rule 408", but is not marked confidential pursuant to the Protective Order, Dkt. 82. Plaintiffs likely will oppose Google's request to redact portions of that email. The information in the Declaration comes from documents that Google has marked either Confidential or Attorneys' Eyes Only pursuant to the Protective Order, Dkt. 82. Plaintiffs take no position on whether the information in the Declaration properly is redacted.

Pursuant to Your Honor's Individual Rule 4(B)(iii)(a), Plaintiffs conducted a meet-and-confer with Google's counsel on July 29, 2025 to discuss this issue. Google maintained its position that this information must be filed in redacted form. Pursuant to Your Honor's Individual Rule 4(B)(iii)(a), Plaintiffs will notify Defendant "that it must file, within three days, a letter explaining the need to seal or redact" this information in the declaration.

Respectfully submitted,

/s/ Matthew J. Oppenheim
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